

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOLORES C. OMOREBOKHAE

Plaintiff

-against-

08CV1512 (JUDGE MARRERO)

U-HAUL CO. OF NEW JERSEY, INC., and
U-HAUL INTERNATIONAL, INC.

Defendants

**PLAINTIFF DOLORES OMOREBOKHAE'S INITIAL DISCLOSURE PURSUANT
TO RULE 26(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff Delores C. Omorebokhae, by and through her attorney, Joseph Fleming, Esq., P.C., makes the following initial disclosures:

A. WITNESSES

The following individuals are likely to have discoverable information that Plaintiff may use in support of his claims:

1. Delores C. Omorebokhae
20 West Moshulu Parkway South, Apt. 7G
Bronx, NY 10468

Subject of Information: How the accident occurred. Nature and extent of injuries suffered.

2. Wallace Cooke
31-06 East Buell Street
E. Elmhurst, NY 11369-1915

Subject of Information: How accident occurred. Defendant's negligence.

3. Dr. John Nailor
220 East 161st Street
Bronx, NY 10451

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

4. Dr. William Schell
Riverside Orthopaedic & Sports Medicine Associates
36 West 60th Street
New York, NY 10023

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

5. Dr. Gabriel Dassa
4377 Bronx Boulevard
Bronx, NY 10466

Subject of Information: Nature of Plaintiff's injuries, treatment and prognosis.

B. DOCUMENTS

A description by category and location, of all documents, electronically stored information, and tangible things that Plaintiff has in his possession, custody and control and may use to support his claims are as follows.

Unless otherwise stated, all documents, information, and things described below are in the possession of Plaintiff's counsel, Joseph Fleming, Esq., P.C., at 116 John Street, Suite 2830, New York, NY 10038:

1. Police Report.
2. Rental Agreement between Wallace Cooke and Defendant.
3. Authorization for Plaintiff's medical records.

Plaintiff reserves the right to identify other documents, as such documents come into Plaintiff's possession and control.

C. DAMAGES

Plaintiff's calculation of damages are based on the following:

1. Past and future pain and suffering: \$ 5,000,000.00

Total Damages: \$ 5,000,000.00

Plaintiff has also suffered damages in an amount to be determined, for legal fees and costs associated with this action.

D. INSURANCE

Plaintiff is not now aware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgement in this action.

E. EXPERTS

Plaintiff has not yet retained the services of or consulted with, any expert whose testimony would be presented at trial.

DATED: New York, New York
June 18, 2008



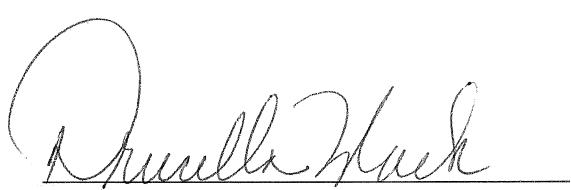
Joseph Fleming, Esq. (JF-9542)
Joseph Fleming, Esq., P.C.
116 John Street, Suite 2830
New York, NY 10038
212-385-8036
Attorneys for Plaintiff Dolores C. Omorebokhae

TO: KEVIN F. PINTER (KFP-P352)
Gallo, Vitucci, Klar, Pinter & Cogan
90 Broad Street, 3rd floor
New York, NY 10004
212-683-7100
Attorneys for Defendant U-Haul Co. of New Jersey, Inc.

CERTIFICATE OF SERVICE

This is to certify that on June 18, 2008, I caused a copy of Plaintiff, Dolores Amorebokhae's Initial Disclosure Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure to Defendants, U-Haul Co. of New Jersey, Inc., and U-Haul International, Inc., to be delivered by mail to the following parties:

Kevin F Pinter, Esq.
Gallo, Vitucci, Klar, Pinter & Cogan
90 Broad Street, 3rd Floor
New York, NY 10004
(212) 683-7100



Drucilla Mack

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOLORES C. OMOREBOKHAE

Plaintiff

-against-

U-HAUL CO. OF NEW JERSEY, INC., et.al.

Defendants

PLAINTIFF DOLORES OMOREBOKHAE INITIAL DISCLOSURE PURSUANT
TO RULE 26(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE

JOSEPH FLEMING, ESQ., P.C.
Attorney(s) for Plaintiff
116 John Street, Suite 2830
New York, NY 10038
(212) 385-8036

To:

Service of a copy of the within
is hereby admitted

Dated: _____, _____

Attorney (s) for _____

PLEASE TAKE NOTICE

NOTICE OF ENTRY

that the within is a (verified) true copy of a
duly entered in the office of the clerk of the within named court on _____

NOTICE OF SETTLEMENT

after an order
will be presented for a settlement to the HON.

of which the within is a true copy

To

Service of a copy of the within is hereby admitted.

Dated: _____

Attorney(s) for _____